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*Attorney for the Plaintiff, proposed FLSA Collective and  
potential Rule 23 Class*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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LIYOU XING,  
*on her own behalf and on behalf of others similarly  
situated*

Plaintiff,

v.

MAYFLOWER INTERNATIONAL HOTEL GROUP  
INC d/b/a Mayflower Hotel;  
MAYFLOWER BUSINESS GROUP, LLC d/b/a  
Wyndham Garden;  
MAYFLOWER INN CORPORATION d/b/a Mayflower  
Hotel;  
MAYFLOWER WENYU LLC d/b/a Wyndham Garden;  
YAN ZHI HOTEL MANAGEMENT INC. d/b/a  
Mayflower Hotel; and  
MAYFLOWER 1-1 LLC d/b/a Mayflower Hotel;  
YUEHUA HU,  
WEI HONG HU, and  
XIAOZHUANG GE

Defendants.  
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**Case No. 18-cv-06616**

**29 U.S.C. § 216(b)  
COLLECTIVE ACTION &  
FED. R. CIV. P. 23 CLASS  
ACTION**

**NOTICE OF PLAINTIFF'S  
MOTION FOR  
CONDITIONAL  
COLLECTIVE  
CERTIFICATION**

**PLEASE TAKE NOTICE** that upon the annexed Declaration of John Troy, sworn to on May 15, 2019, and all exhibits attached thereto, and upon all prior pleadings and proceedings herein, the undersigned shall move this Court, at the United States Courthouse for the Eastern District of New York, before the Honorable Lois Bloom for an Order:

(1) granting collective action status, under the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 216(b);

(2) ordering the Defendants to produce an Excel spreadsheet containing first and last name, last known address with apartment number (if applicable), the last known telephone numbers, last

known e-mail addresses, WhatsApp, WeChat ID and/or FaceBook usernames (if applicable), and work location, dates of employment and position of **ALL current and former non-exempt and non-managerial employees** employed at any time from November 20, 2015 to the present within 15 days of the entry of the order;

(3) authorizing that notice of this matter be disseminated, in any relevant language, via mail, email, text message, or social media messages or posts, to all members of the putative class within 21 days after receipt of a complete and accurate Excel spreadsheet with affidavit from Defendants certifying that the list is complete and from existing employment records;

(4) ordering the Defendants to post the approved Proposed Notice in all relevant languages, in a conspicuous and unobstructed locations likely to be seen by all currently employed members of the collective, and the notice shall remain posted throughout the opt-in period, at the workplace;

(5) ordering the Plaintiffs to publish the Notice of Pendency, in an abbreviated form to be approved by the Court, at Defendants' expense by social media and by publication in newspaper should Defendants fail to furnish a complete Excel list or more than 20% of the Notice be returned as undeliverable with no forwarding address to be published in English, and Chinese; and

(6) ordering the equitable tolling on the statute of limitation on this suit be tolled for 90 days until the expiration of the Opt-in Period.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Court Order dated April 29, 2019, Defendants shall file any opposition with the Court by June 03, 2019.

Dated: Flushing, New York

May 15, 2019

TROY LAW, PLLC  
*Attorneys for the Plaintiff, proposed FLSA  
Collective and potential Rule 23 Class*

/s/ John Troy  
John Troy (JT0481)